

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MINNESOTA**

BROCK FREDIN,

Plaintiff,

--against--

District Court Case No. 17-CV-3058
(SRN)

LINDSEY MIDDLECAMP,

Defendants.

BROCK FREDIN,

Plaintiff,

--against--

District Court Case No. 18-CV-466
(SRN)

GRACE MILLER,
CATHERINE SCHAEFER,

Defendants.

BROCK FREDIN,

Plaintiff,

--against--

District Court Case No. 20-CV-01929
(SRN)

JAMIE KREIL,

Defendant.

CORRECTED DECLARATION OF BROCK FREDIN

STATE OF WISCONSIN }
 ss:
COUNTY OF SAINT CROIX }

BROCK FREDIN, being duly sworn, deposes and says:

1. I am the Plaintiff in the above-captioned proceeding. I submit this declaration in support of my motion for sanctions and show cause response filed on January 3, 2022. For the reasons stated herein and within the memorandum of law in support of sanctions and response, I respectfully seek sanctions against Defendants and their counsel Robins Kaplan and Kutak Rock.

AUTHENTICATION OF DOCUMENTS

2. Attached hereto as **Exhibit A** is a true and correct copy of summary screenshots of the Youtube video titled “Philip Sieff – Predator and Drug Addict” dated December 11, 2021.

3. Attached hereto as **Exhibit B** is a true and correct copy of summary screenshots of the Youtube video titled “Anne Lockner– Manages Robins Kaplan With Team Of Drug Addicts” dated December 11, 2021.

4. Attached hereto as **Exhibit C** is a true and correct copy of summary screenshots of the Youtube video titled “K. Jon Breyer– Rapes Women And Abuses Associates” dated December 11, 2021.

5. Attached hereto as **Exhibit D** is a true and correct copy of summary screenshots of the Youtube video titled “Anne Lockner – Drafts Laughter Ban Order For Kim Jong Un” dated December 29, 2021.

6. Attached hereto as **Exhibit E** is a true and correct copy of summary screenshots of the Youtube video titled “Mahesha Subbaraman – Quintessential Low-T Sh*tlaw Attorney” dated December 13, 2021.

7. Attached hereto as **Exhibit F** is a true and correct copy of summary screenshots of the Youtube video titled “K. Jon Breyer: Devoted to Defending Fraudsters, Felons and Pedophiles” dated October 11, 2021.

8. Attached hereto as **Exhibit G** is a true and correct copy of summary screenshots of a ProtestPress.com article titled “K. Jon Breyer: Low-IQ Ambulance Chaser Defending Convicting Fraudsters” with an Internet address of “<https://www.protestpress.com/k-jon-breyer-low-iq-ambulance-chaser-defending-convicted-fraudsters>” dated October 11, 2021.

9. Attached hereto as **Exhibit H** is a true and correct copy of summary screenshots of the iFunny.co Haynes Hansen “Ram Ranch” video dated January 2, 2022.

10. Attached hereto as **Exhibit I** is a true and correct copy of Mahesha Subbaraman emails to me dated March 10-12, 2013.

PLAINTIFF BROCK FREDIN’S JANUARY 3, 2022 RESPONSE

11. I did not willfully or intentionally violate the injunction.

12. The new videos and websites are not “substantially similar” because there is no pending litigation.

13. The videos and website in question are new.

14. The new videos and websites do not contain “substantially similar” allegations or content.

15. The new videos and websites are not “substantially similar” because they contain content related to legal cases or controversies where I am not involved.

16. I did not publish the Haynes Hansen “Ram Ranch” video to <https://ifunny.co/video/an-actual-youtube-ad-haynes-hansen-associate-at-robins-kaplan-ug3V3SaG8>.

17. Moreover, I did not publish the Haynes Hansen “Ram Ranch” video to any new platform following the November 23, 2020 injunction. Furthermore, I did not direct any third party to publish the video to any platform including iFunny.co. I was not aware of the video or website until doing research on my most recent set of appellate briefs in this case.

18. Anne Lockner’s statement that I “reposted” the video is knowingly false. (*See Fredin v. Kreil*, Lockner Decl. p. 3 ¶ 6, Dock. No. 154.)

19. I believe it’s possible that Defendants posted the video or directed a third party to post the video to iFunny.co as yet another means to entrap me. (*See Ex. A.*)

20. I have known Mahesha Subbaraman for thirty-three (33) years. Mr. Subbaraman and I attended grade school together in Apple Valley/Burnsville, Minnesota. It must be said that Mr. Subbaraman and I grew up together in the same neighborhood. In 2013, I formed a brief attorney-client privilege with Mr. Subbaraman while he was working at Robins Kaplan with respect to a legal matter. (*See Ex. B.*) Ms. Lockner’s statements that the videos about Mr. Subbaraman violate the November 23, 2020 injunction are false because Mr. Subbaraman could not have represented Defendants given his conflict with me. (*See Fredin v. Kreil*, Lockner Decl. p. 4 ¶ 19, Dock. No. 154.)

21. This same assertion raises the question how Robins Kaplan can represent Defendants when Robins Kaplan previously formed a brief attorney-client privilege with me through Mr. Subbaraman.

22. I have known Philip Sieff for upwards of ten (10) years.

23. I have personally witnessed Mr. Sieff state publicly that he “relapsed” with respect to an addictive drug.

24. Mr. Sieff made these statements at a location in Minneapolis, Minnesota.

25. Over the course of ten (10) years, I personally witnessed Mr. Sieff repeatedly state that he “relapsed” or make statements consistent with the same. At times, I recall Mr. Sieff state that he was “struggling” to remain sober given the stress incurred of litigation and his life as an attorney.

26. During these times, I distinctly recall several previous or current clerks from the District Court of Minnesota present. At times, I saw Mr. Sieff talking to these clerks/attorneys. Similarly, this includes then active clerks from the Eighth Circuit.

27. Additionally, I recall the sons of federal judges present when Mr. Sieff made statements consistent with “relapse” and struggling to remain sober.

28. I believe that Eric J. Magnuson is a current partner at Robins Kaplan and a former *very brief* Chief Justice of the Minnesota Supreme Court.

29. I do recall likely meeting Chief Justice Eric J. Magnuson. Chief Justice Magnuson and I were both present at Chief Justice Douglas K. Amdahl’s funeral. I believe Chief Justice Magnuson may have escorted my sister Faith Amdahl during Chief Justice Amdahl’s final burial process at Fort Snelling.

30. Given this conflict, the November 23, 2020 injunction could not apply to Robins Kaplan partner Philip Sieff or Chief Justice Eric J. Magnuson.

31. Similarly, the websites involving Eighth Circuit Judge David Stras do not violate the November 23, 2020 injunction. Judge Stras signed an *en banc* Order with respect to the same injunction.

PLAINTIFF BROCK FREDIN’S JANUARY 3, 2022 SANCTIONS

32. As described above, Ms. Lockner’s statements regarding the Haynes Hansen video “respost” are knowing false and best addressed with sanctions.

33. K. Jon Breyer filed a late supplemental brief or declaration stating that criticism involving his Tom Petters trustee representation with Doug Kelley was a violation of the November 23, 2020 injunction. This is false and best addressed with sanctions.

34. I was employed at Fingerhut's newly formed holding company, Blue Stem Brands, on the payments team as a software developer during portions of the bankruptcy.¹ The injunction does not preclude me from criticizing K. Jon Breyer's corrupt litigation practice with respect to his representation tied to a company where I previously worked.

35. I am requesting that Defendants and their counsel Robins Kaplan and Kutak Rock be referred to the state and federal Office of Professional Responsibility.

Dated: January 10, 2022
Saint Croix County, WI



s/ Brock Fredin

Brock Fredin
Saint Croix County, WI 54002
(612) 424-5512 (tel.)
brockfredinlegal@icloud.com
Plaintiff, Pro Se

¹ See [linkedin.com/in/brockfredin/](https://www.linkedin.com/in/brockfredin/)

A



ROBINS  KAPLAN^{LLP}

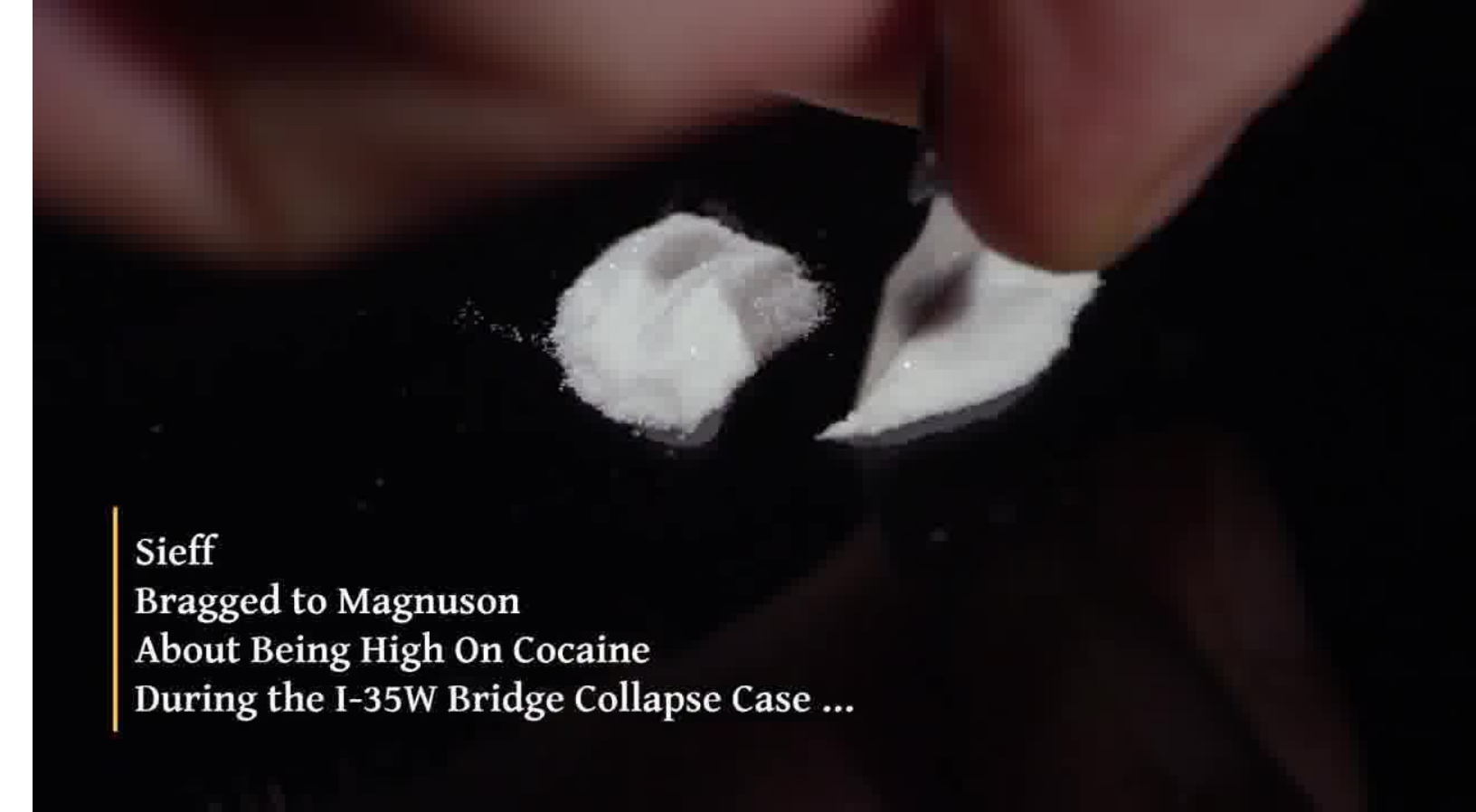
REWRITING THE ODDS



Self-Proclaimed "America's Top 100 Attorney"
In Minneapolis



Philip Sieff
Procured Young Women
In Minneapolis' King Of Diamond Club
With Eric J. Magnuson



Sieff
Bragged to Magnuson
About Being High On Cocaine
During the I-35W Bridge Collapse Case ...



... And Hearings In
Senator Paul Wellstone's Plane Crash

... And Hearings In
Senator Paul Wellstone's Plane Crash



ROBINS
KAPLAN LLP

ator And Drug Addict

Philip Sieff

Philip Sieff Is A Fraudster
and Drug Addict

PhilipSieff.com

#DrugAddictSieff, #48HourHold
#DisbarSieff, #DrugTreatmentForSieff

www.PhilipSieff.com

B



Anne M. Lockner (He/Him) Proudly Declares That He Is A Member Of The Executive Board

AnneLockner.com



In Actuality, Lockner Manages Robins Kaplan With A Team Of Drug Addicts And Alcoholics

AnneLockner.com



Lockner Served On The Robins Kaplan Executive Board With Fellow Partner Philip Sieff

ANNE LOCKNER
AnneLockner.com
Business Litigator, Board Member, and Volunteer

A close-up, low-angle shot of a person's face in profile, drinking from a clear glass bottle. The person is wearing a dark jacket. The background is blurred, showing what appears to be an indoor setting with warm lighting. A red banner with white text is overlaid across the middle of the image.

Lockner Knew That Sieff Is A Drug Addict And Alcoholic

AnneLockner.com

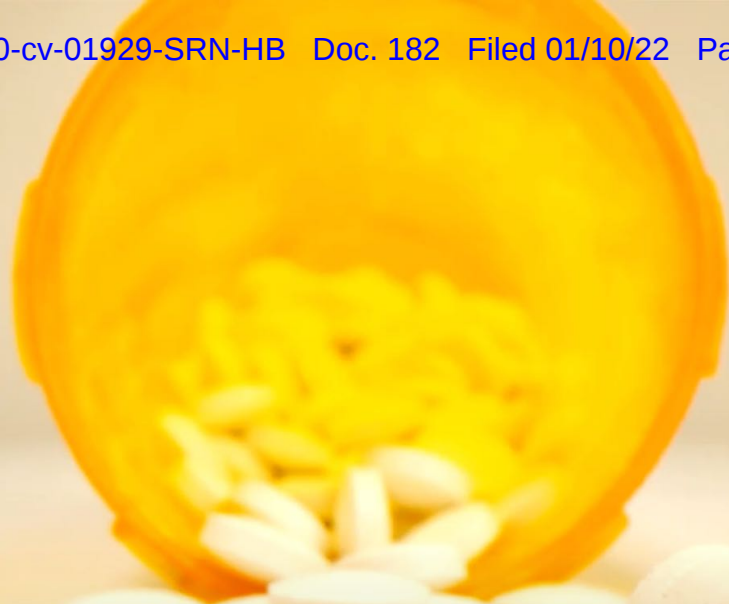
A photograph of a bar scene. In the foreground, a person's arm in a light-colored sweater is pouring a stream of gold coins into a glass. Several other glasses are on the bar. In the background, a man with a beard is visible, looking towards the camera. The scene is dimly lit with warm bar lighting.

Sieff Stated Publicly That He 'Relapsed' And Was 'Struggling' With Sobriety



During The I-35W Bridge Collapse Case

AnneLockner.com



Lockner Knew That Sieff 'Relapsed' And Did Nothing Because It Would Jeopardize Robins Kaplan Profit



Drug Addicts That Publicly State That They Had 'Relapsed' During The I-35W Bridge Collapse Cases

AnneLockner.com



In Other Words, Lockner Manages Robins Kaplan With A Team Of Drug Addicts And Alcoholics

AnneLockner.com



Because It Would Jeopardize Robins Kaplan's Reputation And Credibility

AnneLockner.com



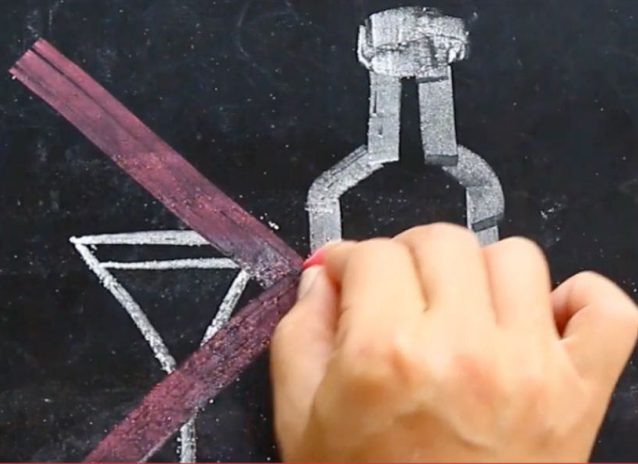
Just As She Has Done In Many Other Instances Of Attorney Misconduct

AnneLockner.com

A close-up photograph of a person's hand holding a metal compass, drawing a triangle on a dark chalkboard. The chalkboard is set within a wooden frame, and the background is a light-colored wooden surface. The hand is positioned in the upper left, with the compass tip touching the board to complete a side of the triangle. The triangle is drawn with white chalk.

Is Robins Kaplan The Firm You Want To Retain For Your Corporate Legal Affairs?

AnneLockner.com



Is Lockner The Lawyer You Want To Retain? A Partner Who Manages Critical Cases Using Drug Addicts?

AnneLockner.com



An Attorney Who Tries To Cover Up Attorney Misconduct?

AnneLockner.com

C



K. Jon Breyer Rapes Women And Abuses Associates

AttorneyKJonBreyer.com



"THIS IS EXECUTIVE LEVEL BUSINESS!"

D



On December 17, 2021, Kim Jong Un Imposed A Strict Ban On Laughing

AnneLockner.com



A close-up, profile view of a woman wearing a red knit beanie, looking towards the right. In the background, a man with dark hair and a beard is blurred, looking in the same direction. The background is a bright, out-of-focus outdoor setting.

Lockner Is Recognized For Her Lead Roles In Personally Banning Laughter Throughout The United States

AnneLockner.com

A woman with short brown hair and glasses, wearing a black judicial robe over a white collared shirt, is seated in a black leather office chair. She is positioned behind a dark wooden bench. To her right, an American flag stands on a pole. A green desk lamp is visible on the right side of the bench. On the left side of the bench, there is a small scale of justice and a glass of water. A microphone is positioned in front of her. A red banner with white text is overlaid across the middle of the image.

Locker Is Dedicated And Committed To Banning All Laughter Anywhere It Lives Including North Korea

AnneLockner.com



The Order Stipulates That If A Resident Breaks The Laughter Ban, He Or She Can Be Arrested Or Fined

FRANK CAPRIO
CHIEF JUDGE

CAUGHT IN

PROVIDENCE
AmreLockner.com

A photograph of a young man and a young woman looking at a smartphone together. The man is on the left, wearing a dark jacket, and the woman is on the right, wearing a yellow shirt and a dark cap. They are in an indoor setting with a corrugated metal ceiling and bright overhead lights.

Any Resident Found Guilty Is Arrested And Treated As An Ideological Criminal

AnneLockner.com

Lockner Drafted Language Requiring A 5 Year Long Special Duty On Police To "Crackdown" On Laughing

CAUGHT IN

PROVIDENCE

AmneLockner.com

CAUGHT IN
PROVIDENCE

AmneLockner.com

FRANK CAPRIO
CHIEF JUDGE

AnneLockner.com

Anne Lockner

Drafts Laughter Ban For Kim Jong Un

#Hilarious #NoLaughing #LaughterBanned #RapMusic


#WeDon'tListenToRap



E



Low-T Mahesha Subberaman Fired From TTT Firm Robins Kaplan LLP

 MN Courtroom

[Scroll for details](#)

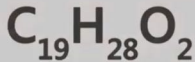
A man with dark hair and a beard, wearing a grey suit, dark shirt, and purple tie, is seated at a wooden courtroom desk. An American flag is visible in the background to the left. A red banner with white text is overlaid on the bottom half of the image.

Mahesha Subbaraman Claims To Be An "Appellate Constitutional Attorney" ...



MN Courtroom

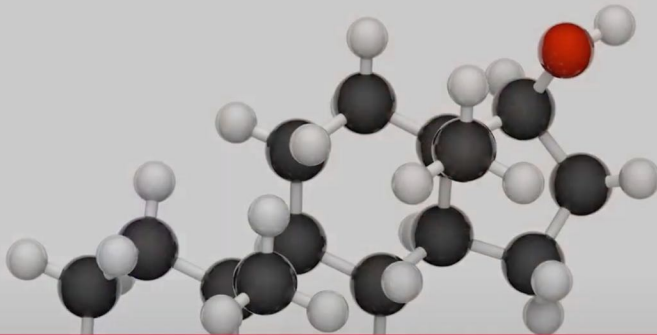
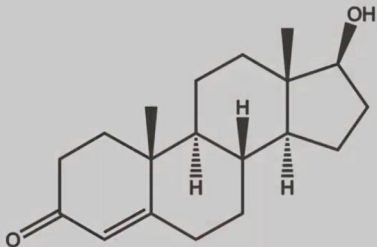
Testosterone



Hydrogen



Carbon



In Reality, Subbaraman Is A Low-T Shitlaw Ambulance Chaser ...

Subbaraman Was Fired As An Associate From Robins Kaplan LLP In 2014 ...



SIGNS OF LOW TESTOSTERONE

MOOD CHANGES
NO MOTIVATION
INCREASED
EMOTIONAL



LOSS
T
ROY

After The Firm Discovered He Was Too Low-IQ Even For Document Review ...



Mahesha Subbaraman: Quintessential Low-T Shitlaw Attorney

**LOW
TESTOSTERONE**

Mahesha Subbaraman: Quintessential Low-T Shitlaw Attorney

F

Press **esc** to exit full screen



K Jon Breyer Claims To Be A "Minnesota Super Lawyer"...

KJonBreyer.com

Scroll for details



**K. Jon Advertises That He Represents
"High Net Worth" Individuals And "Fortune 500 Companies"...**

KJonBreyer.com

In Reality, K. Jon Breyer Represents Fraudsters Like Tom Peters, The Former Owner Of Fingerhut

Minnesota Man Sentenced to 50 Years in Federal Prison for ...

Apr 8, 2010 — MINNEAPOLIS—Theodore "Ph" Petters, age 52, of Wayzata, Minn., has been sentenced to 50 years in federal prison for orchestrating a \$3.7 ...



0:18

Scroll for details

08-45257 (GFK). 08-45258 (GFK). 08-45326 (GFK). 08-45327 (GFK). 08-45328 (GFK). 08-45329 (GFK). 08-45330 (GFK). 08-45331 (GFK). 08-45371 (GFK). 08-45392 (GFK).

013-06-19

Kirstin D. Kanski, Terrence J. Fleming, **K. Jon Breyer**, Adam C. Ballinger, Mark D. Larsen, James A. Lodoen, Sandra S. Smalley-Fleming, Jeffrey D.

<https://www.brendagrantiand.com> > PCI-BK > Petters Company, Inc., et al., Debtors, - Brenda Grantland
On 01/10/22, Brenda Grantland transferred to K. Jon Breyer, a business to a Polaroid, JPMC received ... K. Jon Breyer (#302259). 3902 IDS Center.



Tom Petters Was Convicted On Over 20 Counts Of Business Fraud...

Minnesota Man Sentenced to 50 Years in Federal Prison for ...

Apr 8, 2010 — MINNEAPOLIS—Thomas Petters, age 52, of Wayzata, Minn., has been sentenced to 50 years in federal prison for ...



By: s/ Thomas E. Jamison
Thomas E. Jamison (#220061)
Douglas L. Elsass (#219241)
K. Jon Breyer (#302259)
3902 IDS Center
80 South Eighth Street
Minneapolis, MN 55402
Telephone: (612) 344-9700
Facsimile: (612) 344-9705

ATTORNEYS FOR DOUGLAS A.
KELLEY CHAPTER 11 TRUSTEE

For Stealing From Investors And His Employees...



TOM

And Was Sentenced To Over 50 Years In Prison...

PETTERS COMPANY INCORPORAT



**K Jon Breyer Is A Low-T Loser Attorney Forced
To Represent Fraudsters And Scumbags Like Tom Petters**



**K Jon Breyer Is A Low-T Loser Attorney Forced
To Represent Fraudsters And Scumbags Like Tom Petters**

FOX
KJonBreyer.com

PETTERS HEARING

ST PAUL
Scroll for details

G

LEGAL

K. Jon Breyer: Low-IQ Ambulance Chaser Defending Convicted Fraudsters

Low-T K. Jon Breyer steals money from fraud victims.



By Protest Press Staff
Published October 11, 2021



K. Jon Breyer

Low-IQ Ambulance Chaser Defending Convicted Fraudsters



K. Jon Breyer is an attorney who has made his living defending fraudsters, felons and pedophiles. Breyer defends fraudsters like Tom Petters.

Breyer represented the trustee in Minnesota's biggest Ponzi scheme where he bilked large attorney fees in an effort to divert money meant for victims of the fraud.

Petters was convicted on over 20 counts of business fraud for stealing from investors and his employees. Petters was sentenced to over 50 years in prison.

In effect, enabling Breyer to engorge himself unchecked in Petters bankruptcy trust where he and his team of lawyers including Doug Kelley ran all of Petter's companies into the ground in an effort to sell off any profitable asset to churn large sums for their firms.

Breyer picked away at the Petters bankruptcy carcass for years, until there was nothing left for unsecured creditors, like the bondholders, who are only one level above the stockholders in priority.


In this article, Featured, lawyers



WRITTEN BY

Protest Press Staff

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H



ORION 3 jan 2021



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ORION

524 subscribers • 1.5K subscriptions

Photographer, car person, outdoorsman, volunteer firefighter.



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iFunny
Jan 2, 2021

[REDACTED]

Mahesha Subbaraman has sent you a message.

CASE 0:20-cv-01929-SRN-HB Doc. 182 Filed 01/10/22 Page 67 of 68

Date: 3/12/2013

Subject: Thanks for Coming out to Downtown for Lunch

Hey Brock – It was good having lunch with you today. I'm glad to see that [REDACTED]
[REDACTED], and I much appreciated our discussion on a variety of subjects. Hope we can do it again in the future!

Best,

Mahesha

Mahesha Subbaraman has sent you a message.

Case: 0:20-cv-01929-SRN-HB **Doc.** 182 **Filed** 01/10/22 **Page** 68 of 68

Subject: RE: hey oh

Hey Brock,

Lunch this week sounds like a great idea!

I'm free on Tuesday and Thursday (say Noon?).

Do either of those days work for you?

Also, in terms of location, any place in downtown Minneapolis works for me -- I'm a big fan of [REDACTED]
[REDACTED] Capital Grille, and Atlas Grill.

Best,

Mahesha